

Plaza Automotive of Orangeburg, LLC v. FCA U.S. LLC
Civil Action No.: 5:20-cv-01567-MGL
Amended Complaint

EXHIBIT I
(December 2017 email)

buddy@plazaautomotivegroup.com

From: Paul La Rosa <paul.larosa@plazacdjorangeburg.com>
Sent: Thursday, December 28, 2017 2:56 PM
To: 'Peter Rickman'
Cc: buddy@plazaautomotivegroup.com; 'Morgan Schuman'; wes.larabee@plazacdjorangeburg.com
Subject: RE: Plaza deals in funding.

Follow Up Flag: Follow up
Flag Status: Flagged
Categories: PLAZA ORANGEBURG

Thank you Peter. Please don't take anything I have mentioned as a reflection on you. This is a funding issue!

Paul La Rosa
General Manager
803-534-5251



From: Peter Rickman [mailto:prickman@chryslercapital.com]
Sent: Thursday, December 28, 2017 2:37 PM
To: Paul La Rosa <paul.larosa@plazacdjorangeburg.com>
Subject: RE: Plaza deals in funding.

I have a senior (old friend) working the deals now-

But will email the Director shortly

From: Paul La Rosa [mailto:paul.larosa@plazacdjorangeburg.com]
Sent: Thursday, December 28, 2017 1:25 PM
To: Peter Rickman <prickman@chryslercapital.com>

Cc: Morgan Schauman <MSCHAUMAN@chryslercapital.com>; buddy@plazaautomotivegroup.com; 'Adams Robert (FCA)' <robert.i.adams@fcagroup.com>
Subject: RE: Plaza deals in funding.

Peter,

I really appreciate your help. After speaking with funding this morning, they told me they were missing documents that my Finance manager just showed me were uploaded a long time ago in your system. I would love to speak with a funding manager, but no one can give me a name or contact information. Are there funding managers?

Paul La Rosa
General Manager
803-534-5251



From: Peter Rickman [<mailto:prickman@chryslercapital.com>]
Sent: Thursday, December 28, 2017 2:07 PM
To: Paul La Rosa <paul.larosa@plazacdiorangeburg.com>
Cc: Morgan Schauman <MSCHAUMAN@chryslercapital.com>; wes.larabee@plazacdiorangeburg.com; buddy@plazaautomotivegroup.com
Subject: RE: Plaza deals in funding.

Paul-

Yes, please vent your frustration as well to funding, they need to be aware. Sorry I did not respond earlier as I just logged in because I am working late again.

I emailed Ashley and we have escalated this with funding -

Working on this-
Peter

From: Paul La Rosa [<mailto:paul.larosa@plazacdiorangeburg.com>]
Sent: Thursday, December 28, 2017 9:22 AM
To: Peter Rickman <prickman@chryslercapital.com>

Cc: Morgan Schauman <MSCHAUMAN@chryslercapital.com>; wes.larabee@plazacdorangeburg.com; buddy@plazaautomotivegroup.com
Subject: RE: Plaza deals in funding.

Peter,

On the phone again this morning with funding and they have once again made liars out of everyone. They have not funded Hogg and now they are missing a phone bill that they have had. This is a joke! Where is a funding manager in all this???? At what point does someone in this department actually get involved? The "Secret Society of Funding Mangers" is getting a little ridiculous. Can someone provide me a name?

Paul La Rosa
General Manager
803-534-5251



From: Peter Rickman [<mailto:prickman@chryslercapital.com>]
Sent: Wednesday, December 27, 2017 5:16 PM
To: Paul La Rosa <paul.larosa@plazacdorangeburg.com>
Cc: Morgan Schauman <MSCHAUMAN@chryslercapital.com>; wes.larabee@plazacdorangeburg.com; buddy@plazaautomotivegroup.com
Subject: RE: Plaza deals in funding.

Paul-

I agree communication can be better and we are working towards this as we discussed.

I am having funding complete the PFCI stip to fund this one 94436325.

I am just pointing out this can be avoided if the structure changes at time of signing we need to know upfront. When a deal is in-house we are limited on what we can and cannot do to fund a deal. We need to have a decision reflect what is on the contract- When pulling trades etc in funding we need to do a "work around" to honor and fund what was contracted. Numerous departments are involved when we honor stip outside the guild lines of our approvals

Thanks

From: Paul La Rosa [<mailto:paul.larosa@plazacdiorangeburg.com>]
Sent: Wednesday, December 27, 2017 4:06 PM
To: Peter Rickman <prickman@chryslercapital.com>
Cc: Morgan Schauman <MSCHAUMAN@chryslercapital.com>; wes.larabee@plazacdiorangeburg.com; buddy@plazaautomotivegroup.com
Subject: RE: Plaza deals in funding.

Peter,

Once again, I appreciate the help. My frustration exists when a rehash occurs and funding does not honor the buyer's rehash. The issue exist because there is no communication. I have worked with several manufacturer supported banks (Volkswagen, FMCC, SETF etc.). In each instance, the funding department worked alongside the credit department. In fact, in most cases, they share the same floor of the same building and can actually walk over and resolve funding issues. How can we have the type of efficiency needed when the right leg doesn't know what the left leg is doing. If that isn't resolved, this problem will continue to occur. I have already approved the fee in Route One on the Darby deal. Jefferson has been resent to you. With respect to Hogg, when can I expect funding to get the message?

Thanks,

Paul La Rosa
General Manager
803-534-5251



From: Peter Rickman [<mailto:prickman@chryslercapital.com>]
Sent: Wednesday, December 27, 2017 4:31 PM
To: Paul La Rosa <paul.larosa@plazacdiorangeburg.com>
Cc: Morgan Schauman <MSCHAUMAN@chryslercapital.com>; wes.larabee@plazacdiorangeburg.com; buddy@plazaautomotivegroup.com
Subject: RE: Plaza deals in funding.

Paul-

Looking over these three deals there is one thing in common. All these deals came in different than what we approved upfront. When we have to re-hash a deal when it's in for funding to match the contract, this slows down the process.

Hogg – App Id 94491270

A. The deal was approved at full invoice even though the unit had 21k miles..
On 12/13 Wes and Elizabeth came to understanding on structure on the new 18,424.43 invoice (due to miles) (12/22) ... We received the contract and in the process of honoring the following terms

Funding is working this up now

Jefferson – App Id 94999254

-send back in matching these terms:

Received on the 14th. no decision id's had a structure without a trade.
No calls to credit besides 12/2..... then again when deal was in-house on 12/22
On 12/22 – we were told we needed a structure without a trade...
So we worked a deal with no trade to make the deal work...
The sales price should be 7080 and a line 3 of
5680 which includes 2150 down (cash) with a 13.13% discount and a rate of 25.67...

USCAR FINANCIAL
Note: UPDATED: MAX LINE 3 \$5,680.00 MAX BACKEND
\$930.00 - APPROVED AS STRUCTURED, CALL IF ANY
CHANGES OCCUR, TO PREVENT ANY ADDITIONAL FEES IN
FUNDING - THANKS
Stipulations: 1.
Application Snapshot: Amt.Financed=6610.00 Disc.=
867.90 Disc %=13.13 Trade Allow=0 Cash Price=7080.00
Rebate=0 Payment=180.78 Stipped Book=6200.00 Actual
Book=6200.00 Veh. Year=2012 Veh. Make=FORD Veh.
Model=FOCUS Veh. Mileage=68842 Buy Rate=26.67 Part %=0
Term=72 LTV=106.61 Custom Score=234 BK Score=0 Pricing
Tier=69 Cash Down=2150.00 Total Down=2150.00 Shave
Rate=0 MSRP =8425.00 Adjusted MSRP =8425.00 Addons =0
Buyer Adj =0

Darby – App Id 94436325

Deal came in 1300,00 over in backend, no POD, book was off..

Received new book and stips and re-worked the deal.. In meantime customer said unit pulls to the left and didn't want the car- but eventually agreed to keep it..

199 additional discount to fund with extra backend..

From: Paul La Rosa [<mailto:paul.larosa@plazacdlorangeburg.com>]
Sent: Wednesday, December 27, 2017 2:21 PM
To: Peter Rickman <prickman@chryslercapital.com>
Cc: Morgan Schuman <MSCHAUMAN@chryslercapital.com>; wes.larabee@plazacdlorangeburg.com; buddy@plazaautomotivegroup.com
Subject: Plaza deals in funding.

Peter,

Thank you for taking the time to work with us to figure out what is going on with these deals in funding. The three deals currently held in funding are:

Jefferson – App Id 94999254
Hogg – App Id 94491270
Darby – App Id 94436325

These contracts are extremely aged and the Funding Department has no idea of what they are talking about. In fact, unlike the credit department, you can't speak to a funding manager and the associates will not even give their name or email address.

Thanks Again for your help,

Paul La Rosa
General Manager
803-534-5251



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